The Chemours Company FC, LLC
Sustainability, Room 13120
1007 Market Street
Wilmington, DE 19801
USA

February 6, 2018

U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics
Confidential Business Information Center (CBIC) – TS7407M
Attention: Scott Sherlock
William Jefferson Clinton Building
1201 Constitution Avenue, NW
Washington, DC 20004-3302

SUBJECT: P-08-0508/0509 – Response to EPA Headquarters' January 17, 2018 and February 5, 2018 Emails from Scott Sherlock

Dear Mr. Sherlock:

This letter and the enclosed information is submitted in response to the U.S. Environmental Protection Agency's ("Headquarters'") January 17th email captioned "Studies in P-08-508 and 509" and February 5th email captioned "FW: Non-CBI GenX Studies on I:\". Chemours initially provided fifty-seven studies by letter dated January 30, 2018 and this letter provides an additional six studies in response to EPA Headquarters' second request.

Headquarters' February 5th email also requested clarification on the test substance in DuPont-19713 RV1, DuPont-19714 RV1 and DuPont-19897. The test substance is identified in DuPont-19713 RV1 and DuPont-19714 RV1 on page 7 as "Crude Industrial Grade HFPDODA Ammonium Salt; H-27529." The test substance is identified in DuPont-19897 on page 7 as "Crude Industrial Grade HFPDODA; H-27529." The consolidated PMN list of attachments originally submitted to the Agency identifies the test substance in all three reports as the acid – 4(A) [not ammonium salt – 4(B)]. H-27529 was the internal designation given by DuPont to the ammonium salt (P-08-509). Chemours believes that the test substance in all three of these reports is indeed the ammonium salt. The study information (Substance Tested) in DuPont-19897 will not be revised since it is not a Chemours report.

The Chemours Company FC, LLC hereby submits via compact disk the studies listed below in response to Headquarters' request for entirely non-confidential versions of selected studies for P-08-0508 (CAS RN 13252-13-6) and P-08-0509 (CAS RN 62037-80-3).[1] For your convenience, the first page of each study is also included herewith.

1	DuPont-22932	H-28072: Acute Oral Toxicity Study in Rats - Up-and-Down Procedure
2	DuPont-24010	Repeated Dose Oral Toxicity 7-Day Gavage Study in Mice
3	DuPont-25438 RV1	H-28308: Acute Oral Toxicity Study in Rats - Up-and-Down Procedure
4	HLR 2-63	Acute Oral Test
5	HLR 61-95	Combined Two-Week Inhalation Toxicity and Micronucleus Studies with H-20427 and H-20428 in Rats
6	HLR 188-94	Mutagenicity Testing of H-20427 in the Salmonella Typhimurium Plate Incorporation Assay

Please contact me if you have any questions about this submission or need further clarification.

Sincerely,

Dawn S. Clark

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[1] PMN Attachments 117 and 118 were for different test substances, but are included herewith at the request of Headquarters.

TRADE SECRET

Study Title

H-28072: Acute Oral Toxicity Study in Rats - Up-and-Down Procedure

TEST GUIDELINES: U.S. EPA Health Effect Test Guidelines
OPPTS 870.1100 (2002)

OECD Guideline for the Testing of Chemicals
Section 4 (Part 425) (2001)

AUTHOR: Carol Carpenter, B.A.

STUDY COMPLETED ON: July 25, 2007

PERFORMING LABORATORY: E.I. du Pont de Nemours and Company
Haskell[SM] Laboratory for Health and Environmental Sciences
P.O. Box 50
Newark, Delaware 19714
U.S.A.

LABORATORY PROJECT ID: DuPont-22932

WORK REQUEST NUMBER: 17199

SERVICE CODE NUMBER: 834

SPONSOR: E.I. du Pont de Nemours and Company
Wilmington, Delaware 19898
U.S.A.

This is an electronic version of the final report. No signatures are necessary.

DUPONT HASKELL GLOBAL CENTERS FOR HEALTH & ENVIRONMENTAL SCIENCES
Discovery Toxicology Group

Repeated Dose Oral Toxicity 7-Day Gavage Study in Male Mice

WORK REQUEST:	17474
SERVICE CODE:	1655
HASKELL NUMBER:	28308
DUPONT REPORT NUMBER:	24010
TESTING SOP NUMBER:	DC007-T-001
STUDY START DATE:	26-October-07
STUDY END DATE:	14-December-07
NOTEBOOK(s):	E-111389-BG
STUDY DIRECTOR:	Diane L. Nabb, Staff Toxicologist
REPORT ISSUE DATE:	February 14, 2008

OBJECTIVE

To determine target organ toxicity in mice exposed to H-28308 orally for 7 days.

STUDY DESIGN

Test Substance:	HFPO Dimer Acid Ammonium Salt
Lot/Batch Number:	E1131181-6
Purity:	86.6% (dose corrected for purity)
Species:	Mouse
Strain:	Crl:CD1(ICR)
Gender:	Male
Age at start:	~6 weeks
Group Size:	5 males
Dose Levels:	30 mg/kg
Route:	Oral gavage
Dosing Volume:	10 mL/kg
Dose Vehicle:	Water
Dosing Frequency:	Daily, Day 0-Day 6

TRADE SECRET

Study Title

H-28308: Acute Oral Toxicity Study in Rats - Up-and-Down Procedure

TEST GUIDELINES: U.S. EPA Health Effect Test Guidelines
OPPTS 870.1100 (2002)

OECD Guideline for the Testing of Chemicals
Section 4 (Part 425) (2001)

AUTHOR: Carol Carpenter, B.A.

STUDY COMPLETED ON: May 28, 2008

REVISION 1 COMPLETED ON: July 23, 2008

PERFORMING LABORATORY: E.I. du Pont de Nemours and Company
DuPont Haskell Global Centers
for Health & Environmental Sciences
P.O. Box 50
Newark, Delaware 19714
U.S.A.

LABORATORY PROJECT ID: DuPont-25438

WORK REQUEST NUMBER: 17474

SERVICE CODE NUMBER: 834

SPONSOR: E.I. du Pont de Nemours and Company
Wilmington, Delaware 19898
U.S.A.

Copies to: C. W. Maynard, Jr., (6)
R. E. LeBleu (3)

E. I. du Pont de Nemours and Company
Haskell Laboratory for Toxicology and Industrial Medicine

HASKELL LABORATORY REPORT NO. 2-63 MR NO. 597

Material Tested: Tetrafluoro-2-(heptafluoropropoxy)-propionic acid, ammonium salt — Haskell No.: 3108

Submitted by: C. W. Maynard, Jr., Organic Chemicals Department, Pioneering Research Division — Other Codes: PR-143J, HFPO Dimer Acid

ACUTE ORAL TEST

Procedure: The test material was administered by stomach tube as an aqueous solution in single doses to young adult ChR-CD male rats. Survivors were killed 14 days later.

Sol'n %	Dose (mg/kg)	Mortality*	Toxic Signs	Weight When Killed: Body (gm)	Weight When Killed: Liver (gm)	Liver Wt. / Body Wt. x 100	ALD
70	17,000	D - 2 hr.	Lethal Doses: Discomfort, gasping or tonic convulsions before death.				
70	12,963	D - 1 1/4 hr.					
70	11,000	D - 3 1/4 hr.					
70	7500	D - 3 1/4 hr.					
50	5000	S - 14 d.		331	17.2	5.2	7500 mg/kg
70	3400	S - 14 d.	Nonlethal Doses: Discomfort, increased water intake, inactivity, polyuria at higher levels, initial weight loss at 5000, 3400 and 2250 mg/kg.	365	18.6	5.1	
70	2250	S - 14 d.		380	18.9	5.0	
10	1000	S - 14 d.		372	16.5	4.4	
1	130	S - 14 d.		385	16.8	4.4	
0.1	12	S - 14 d.		360	14.7	4.1	
0.01	1.5	S - 14 d.		375	16.5	4.4	

* D - ( ) hr. = Found dead ( ) hours after dosing
S - ( ) d. = Sacrificed ( ) days after dosing

Study Title

Combined Two-Week Inhalation Toxicity and Micronucleus Studies with H-20427 and H-20428 in Rats

Laboratory Project ID

Haskell Laboratory Report Number 61-95

Author

David P. Kelly

Study Completed on

September 21, 1995

Performing Laboratory

E. I. du Pont de Nemours and Company
Haskell Laboratory for Toxicology and Industrial Medicine
Elkton Road, P. O. Box 50
Newark, Delaware 19714

Medical Research Number 9713-001

TRADE SECRET

Study Title

MUTAGENICITY TESTING OF H-20427 IN THE SALMONELLA TYPHIMURIUM PLATE INCORPORATION ASSAY

Laboratory Project ID

Haskell Laboratory Report No. 188-94

Study Director

Stephanie W. D'Amico, B.A.

Study Completed on

November 10, 1994

Performing Laboratory

E. I. du Pont de Nemours and Company
Haskell Laboratory for Toxicology and Industrial Medicine
Elkton Road, P. O. Box 50
Newark, Delaware 19714

Medical Research No. 9713-001